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Of Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
EUGENE DIVISION

DEREK JOHNSON, personal representative of
KELLY CONRAD GREEN II, deceased; KELLY
CONRAD GREEN; and SANDY PULVER,

Plaintiffs,

v.

CORIZON HEALTH, INC., a Tennessee
Corporation; LANE COUNTY, an Oregon county;
DR. JUSTIN MONTOYA, an individual; VICKI
THOMAS, an individual; KIRSTIN WHITE, an
individual; and SHARON EPPERSON (née
FAGAN), an individual,

Defendants.

Civil Action No. 6:13-cv-01855-TC

PLAINTIFFS' EXHIBIT LIST

Pursuant to the Trial Management Order, plaintiffs submit the following exhibit
list.

<u>Exhibit Number</u>	<u>Description</u>
1	Book-In Activity Report
4	Booking Report for Kelly Conrad Green
5	Initial Assessment Instrument (2/11/13)
6	Adult Corrections Booking Form
8	Initial Assessment Instrument (12/19/12)

9	Initial Assessment Instrument (1/18/13)
10	Intake Receiving and Screening (12/20/12)
11	Mental Health Progress Note (12/31/12)
12	Mental Health Progress Note (1/3/13)
13	"Fit for Confinement" Guideline Instrument
17	Photo stills from jail video
18	Memo by D.S. Burnette (2/13/13)
19	Email from Jody Jobanek-Suiter (3/18/13)
20	Excerpt from Emergency Log Book
22	Resident Transaction Receipt
23	Inmate Observation Report Form
24	Citation to Appear
26	Offender Log for Kelly Conrad Green
28	RFP Scoring
30	Medical Services RFP Brief
36	Personal Services Contract between Corizon Health, Inc. and Lane County
41	Eugene Police Department Custody Report 12-23020
47	Eugene Fire & EMS Department Patient Care Report
48	Corizon Progress Notes
57	Emergency Room Referral
58	Mental Health Evaluation Tools (METS): Suicide Watch Status
59	Suicide Precaution Form
60	Notice of Director's Hold
71	Corizon Policy & Procedure: Receiving Screening
72	Intake Health Screening & Transfers
75	Transport Report
76	Suicide Risk Warning
89	Corizon Employee Roster
95	Memo by D.S. Peters (2/13/13)
101	Event Entry
102	Sentinel Event Notification Form
109	Time Detail for Kirstin White
116	Email by Kirstin White (8/12/13)
117	Drawing by Jona Bourgard
119	Independent Contractor Physician Agreement
120	Site Medical Director
121	Semi-Monthly Subcontractor Timesheet
125	Emergency Room Referral
128	Sentinel Event (SE) Process
130	Standards for Health Services in Jails (2008)
131	MAC Meeting Notes (2/12/13)
132	Non-Designated Sentinel Event Review Form
134	Consolidated Financial Statements of Valitas Health Services, Inc. and Subsidiaries
136	Corizon Health, Inc. and Subsidiaries Consolidated Balance Sheets (12/31/13)
137	Letter from John Devlin (4/1/13)

138	Defendant Corizon Health, Inc.'s Response to Plaintiffs' Fourth Set of Interrogatories to Defendants
139	Corizon Health, Inc. and Subsidiaries Consolidated Balance Sheets (9/30/14)
140	Training Sign Sheet (4/27/15)
141	Corizon Medical Chart for Kelly Conrad Green
142	Final Report of the New York State Commission on Correction (2004)
143	Offender Health Care at Baltimore City Detention Center (by grand jury) (2005)
144	Contracted Health Care Services for New York City Prison Inmates (by New York City Department of Health and Mental Hygiene) (2005)
145	Investigation of Delaware Correctional Center (by US DOJ) (2006)
146	Healthcare in New York Prisons (by Correctional Association of New York) (2009)
147	Investigation Report (by ICE) (2009)
148	Health Care Services in State Correctional Facilities (by Maine legislature) (2011)
149	Report of Marc F. Stern, MD, MPH (2012)
150	Investigation Report (by ICE) (2012)
151	Louisville Metro Department of Corrections Case Report #2012-043 (2013)
152	Examination Report on Corizon Health, Inc.'s Compliance with Contract #153496 with Allegheny County (2014)
153	Eugene Police Department In-Car Video (2/11/13)
154	Lane County Adult Corrections Videos (2/12/13)
155	Excerpts of Lane County Adult Corrections Videos
156	Remembrance Video
157	<i>Hadix v. Caruso</i> , 461 F. Supp. 2d 574 (W.D. Mich. 2006)
158	<i>Fields v. Corizon Health, Inc.</i> , 2011 WL 3878373 (M.D. Fla. Sep. 2, 2011)
159	<i>Fields v. Corizon Health, Inc.</i> , 490 Fed. Appx. 174 (11 th Cir. 2012)
160	Glasgow Coma Scale
161	Performance-Based Standards for Adult Local Detention Facilities
162	Photos from the Lane County Jail
163	Initial Assessment Instrument (12/6/12)
164	Corizon Policy & Procedure – Sentinel Event Review
165	Sentinel Event Review Introduction and Rationale
166	X-ray (2/12/13)
167	Corizon Health, Inc. Med Mal Lawsuits 2/15/2008 – 2/15/2013
168	Excerpts of Corizon 2015 Proposal for Lane County Contract
169	Excerpts of Sacred Heart Riverbend records (2/12/13 – 3/20/13)
170	Excerpts of Kindred records (3/20/13 – 5/13/13)
171	Excerpts of Everett Care & Rehab records (5/13/13)
172	Excerpts of Providence Everett records (5/13/13 – 5/30/13)
173	Excerpts of Everett Care & Rehab records (5/30/13 – 6/1/13)
174	Excerpts of Providence Everett records (6/1/13 – 6/28/13)
175	Weeping Ridge Pre-Admission Assessment (6/13/13)
176	Excerpts of Weeping Ridge records (6/28/13 – 8/23/13)
177	Excerpts of Kadlec Regional Medical Center records (8/23/13)
178	Excerpts of Weeping Ridge records (8/23/13 – 9/16/13)
179	Excerpts of Kadlec Regional Medical Center records (9/16/13 – 9/17/13)

180	Excerpts of Weeping Ridge records (9/17/13 – 9/24/13)
181	Excerpts of Kadlec Regional Medical Center records (9/24/13 – 9/28/13)
182	Excerpts of Weeping Ridge records (9/28/13 – 10/7/13)
183	Excerpts of Weeping Ridge records (10/8/13 – 12/16/13)
184	Excerpts of Othello Community Hospital records (10/14/13)
185	Excerpts of Dr. Thomas Tan records (10/22/13 – 11/18/13)
186	Excerpts of Kadlec Regional Medical Center records (11/19/13 – 11/23/13)
187	Excerpts of Washington Sacred Heart Medical Center records (12/14/13 – 12/16/13)
188	Letter from Dr. Woodrow Myers to Honorable Phil Mendelson (3/18/15)
189	Pleadings from <i>Tackberry v. County of Alameda</i> (N.D. Cal.)
190	Pleadings from <i>James v. City of Philadelphia</i> (E.D. Pa.)
191	Pleadings from <i>Campbell v. Prison Health Services, Inc.</i> (M.D. Fla.)
192	Pleadings from <i>Fenton v. Alameda County</i> (N.D. Cal.)
193	Pleadings from <i>Scott v. County of Alameda</i> (N.D. Cal.)
194	Pleadings from <i>Macy v. County of Santa Barbara</i> (C.D. Cal.)
195	Pleadings from <i>Jones v. Campbell</i> (N.D. Fla.)
196	Pleadings from <i>Ellis v. City of Philadelphia</i> (E.D. Pa.)
197	Pleadings from <i>Suain v. Collier County Sheriff</i> (M.D. Fla.)
198	Pleadings from <i>Hammond v. Soll</i> (D. Minn.)
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415	Photo #17

Plaintiffs reserve additional numbers for impeachment exhibits and rebuttal exhibits.

Dated this 18th day of May, 2015.

Respectfully submitted,

/s/ Elden M. Rosenthal

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